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The Honorable Judge Milton Young (267) 299-7368

TO

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Schrotberger v. Doe, et al., USDC EDPA, Case No. 2:21-CV-00364-JMY

RE

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October 20, 2022

VIA FAX (267-299-7368)

The Honorable John Milton Younge
4007 U.S. Courthouse
601 Market Street
Philadelphia, PA 19106

RE: Schrotberger v. Doe, et al., USDC EDPA, Case No. 2:21-CV-00364-JMY

Dear Judge Younge:

I write on behalf of plaintiff, Jillian Schrotberger and defendant, SNP Transformations, Inc. in the above-referenced matter. The parties respectfully request a short extension of the deadlines set in the Court's Scheduling Order dated September 9, 2022.

The parties are actively engaging in discovery and mutually agree that the volume of requested documents and the number of anticipated depositions necessitate a two-month extension of the current case deadlines. Jointly, therefore, the parties respectfully request that the Scheduling Order be amended to provide a 2-month extension of deadlines, as follows:

1. All fact discovery shall be completed by **Friday, March 17, 2023**.
2. The parties shall produce their expert report(s) by **Friday, March 31, 2023**; rebuttal expert report(s) shall be produced by **Friday, April 14, 2023**; all expert discovery, including depositions of expert witnesses shall be completed by **Friday, April 28, 2023**.
3. All motions for summary judgment and *Daubert* motions shall be filed no later than **Tuesday, May 30, 2023**. Responses to such motions shall be filed no later than **Friday June 30, 2023**.

Thank you for your courtesies in this matter.

Respectfully yours,

Lorena E. Ahumada

cc (via email):

Gregory S. Hyman, Esq.
Katharine W. Fogarty, Esq.